

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

MDL No. 1456

CIVIL ACTION: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO:
State of Iowa v. Abbott Laboratories., et. al

Judge Patti B. Saris

AFFIDAVIT OF STUART FULLERTON

STUART FULLERTON hereby certifies as follows in support of Defendants AstraZeneca Pharmaceuticals LP's and AstraZeneca LP's Motion to Dismiss the Complaint:

1. I am Senior Litigation Counsel for AstraZeneca Pharmaceuticals LP, 1800 Concord Place, Wilmington, Delaware 19850.

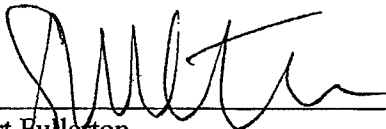
2. I am knowledgeable about the matters stated herein and in the attached Settlement Agreement and Release and if called to testify in this matter would and could competently testify thereto.

3. In 2003, AstraZeneca Pharmaceuticals LP and Zeneca Inc. entered into a settlement agreement with the State of Iowa. A true and correct copy of such settlement agreement is attached hereto as Exhibit A.

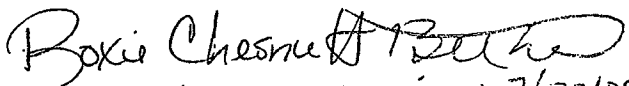
4. Pursuant to the settlement agreement, the State of Iowa released and discharged AstraZeneca Pharmaceuticals LP, Zeneca Inc. and their affiliates, among others, from any civil or administrative claims for Medicaid damages or penalties arising out of certain conduct relating to Zoladex®. See Exhibit A, at 2-4, 7.

5. AstraZeneca LP, while not a signatory to the settlement agreement, is an affiliate of AstraZeneca Pharmaceuticals LP and thus is included within the release of claims by the State of Iowa.

6. The undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Stuart Fullerton


My Commission Expires : 7/27/08